

Floyd White et al.

Plaintiff

V.

Wayfair, Inc., et al.

Defendant

Case No.: 1:24-cv-00094

Judge William L. Campbell, Jr.

Magistrate Judge Barbara D. Holmes

**MOTION FOR EXTENSION OF TIME TO ALLOW DEFENDANTS TO ANSWER
COMPLAINT**

NOW COMES the Plaintiffs, Floyd White et al. by and through undersigned counsel, and hereby moves this Honorable Court for an extension of time to allow the defendants to file their Answer to the Plaintiffs' Complaint. In support thereof, Plaintiffs state as follows:

1. Plaintiff has been contacted by Ms. Jamie Padgett who is corporate counsel to Handy Technologies, Inc. and Angi, Inc. Ms. Padgett represents that she will not be making an appearance and representing the defendants in this action, but will be hiring counsel to do so in the event necessary. Further Ms. Padgett requests an additional 60 days from the date of filing this motion to do so. Plaintiffs do not object.
2. Service of process is complete.
3. Defense counsel is not currently admitted to practice in this District. Defense counsel intends to enter an appearance in this case either pro hac vice or through associated counsel admitted to the bar of this Court when submitting the Answer.
4. The extent of Handy's and Angi's involvement in the matter described in the Complaint is currently uncertain and contingent upon the discovery responses of Defendant Wayfair, Inc. The parties believe that a full and complete response will require additional time for investigation and review.
5. Defense counsel's request for an extension of sixty (60) days is based upon the following: This extension is necessary to allow counsel to fully investigate the facts and circumstances of this case.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that this Honorable Court grant the Motion for Extension of Time to Answer.

Respectfully submitted,

s/Tony Seaton

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